

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE:     Floyd Ambross Downs  
          Felicia Faye Downs, Debtors**

**Case No. 24-51638-KMS  
          CHAPTER 13**

**SECOND APPLICATION FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF NECESSARY EXPENSES  
FOR THOMAS C. ROLLINS, JR.**

COMES NOW, Thomas C. Rollins, Jr., (the “Applicant”) attorney for the debtors, and files this *Second Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Thomas C. Rollins, Jr.* and in support thereof, would respectfully show to this Honorable Court as follows, to-wit:

1.     On November 14, 2024, Debtors filed a bankruptcy petition under Chapter 13 of the bankruptcy code.
2.     The Debtors and Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC (hereinafter “the firm”), have agreed to an hourly billing arrangement in lieu of this Court’s standard “no look” fee award. Per said agreement, attorney T.C. Rollins is billed at a rate of \$360.00 per hour while attorney Jennifer Calvillo is billed at a rate of \$360.00 per hour. Paralegals are billed at a rate of \$155.00 per hour. Legal Assistants bill at \$100.00 per hour. Said rates are reasonable and in keeping with community custom and standards for attorneys in this area. T.C. Rollins and Jennifer Calvillo are both board certified in consumer bankruptcy law by the American Board of Certification.
3.     The Debtors herein did not provide a retainer.
4.     Throughout our representation of the Debtors herein, our firm has maintained itemized billing entries which are completed and maintained contemporaneously with the associated service(s) provided. The services provided by the firm were reasonable in view of the circumstances of this case.

5. The Court previously approved compensation in the amount of \$4,054.92 (Dk #21).
6. The chapter 13 Trustee has disbursed \$2,510.00 on this claim as of May 14, 2025.
7. The time incurred and services provided by the firm since the filing of the previous fee application have resulted in Attorney's fees in the amount of \$710.50 and expenses in the amount of \$84.05 for a total of \$794.55. A detailed accounting of which is attached hereto as Exhibit "A".
8. This is the Applicants' Second request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from January 6, 2025 to May 14, 2025.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys' fees for the professional services rendered herein and authorizing and directing Debtors to pay said attorneys' fees and expenses. Applicants pray for general relief.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Application for Compensation was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Floyd Ambross Downs  
Felicia Faye Downs

CASE NO: 24-51638-KMS

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 5/20/2025, I did cause a copy of the following documents, described below,

Application for Compensation

Exhibit A Invoice

Exhibit C Affidavit

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 5/20/2025

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

Attorney at Law

The Rollins Law Firm

702 W. Pine Street

Hattiesburg, MS 39401

601 500 5533

trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Floyd Ambross Downs  
Felicia Faye Downs

CASE NO: 24-51638-KMS

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 5/20/2025, a copy of the following documents, described below,

Application for Compensation

Exhibit A Invoice

Exhibit C Affidavit

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 5/20/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 W. Pine Street  
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

FLOYD AND FELICIA DOWNS

3749 CUMBERLAND DR.

MOSS POINT MS 39563